

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709

KARISSA D. NEFF
Assistant United States Attorney
Nevada Bar No. 9133
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Karissa.Neff@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Sarah Ziegler,

Plaintiff,

v.

Thomas J. Vilsack, Secretary United States
Department of Agriculture, Agricultural
Research Service; Lawrence Chandler, an
Individual, Alfonso Clavijo, an Individual,

Defendants.

Case No. 2:24-cv-01167-JAD-MDC

**Stipulation to Transfer Venue to the
United States District Court, District of
Kansas**

Plaintiff, Sarah Ziegler, through counsel, and the United States of America, on behalf of Federal Defendants, through undersigned counsel, hereby agree and stipulate to transfer venue from the United States District Court, District of Nevada, to the United States District Court, District of Kansas based on the following:

1. 42 U.S.C. § 2000(e)-5(f)(3) provides that in Title VII cases, venue is proper in the following places: (i) any judicial district in which the allegedly unlawful employment practice was committed; (ii) the judicial district in which the employment records relevant to such practice are maintained and administered; (iii) the judicial district in which the plaintiff would have worked but for the alleged unlawful employment practice; or (iv) if the respondent is not found within any of the foregoing places, then the action may be

brought in the judicial district in which the defendant has its principal place of business. 42
U.S.C. § 2000(e)-5(f)(3).

2. Plaintiff filed the Complaint on June 26, 2024 (ECF No. 1).

3. Plaintiff served the United States with a copy of the Summons and
Complaint on November 12, 2024.

4. The current deadline for the United States to respond to the Plaintiff's
Complaint is January 13, 2025.

5. The United States and Plaintiff entered into a stipulation ("Stipulation")
moving the United States' time to respond to Plaintiff's Complaint through January 25,
2025 (EFC No. 19).

6. The Court entered an order granting the Stipulation (ECF No. 20).

The parties stipulate and agree that venue shall be proper in the District of Kansas
pursuant to 42 U.S.C. § 2000(e)-5(f)(3) based on where the alleged unlawful employment
practices occurred.

Therefore, the parties request that the Court enter an order transferring venue to the
District of Kansas.

Respectfully submitted this 16th day of January 2025.

X
/s/ Jenny L. Foley
JENNY L. FOLEY, ESQ.
Nevada Bar No. 9017
3753 Fairlawn Ave.
Las Vegas, Nevada 89121

Attorney for Plaintiff

JASON M. FRIERSON
United States Attorney

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney

Attorneys for the United States

IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
UNITED STATES MAGISTRATE JUDGE
DATED: 1/17/2025